

UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA

10	UNITED STATES OF AMERICA,)	3:09-CR-0067-LRH-VPC
11	Plaintiff,)	
12	v.)	
13	MICHON MILLS,)	GOVERNMENT EX PARTE PETITION TO
14	Defendant.)	AUTHORIZE DISCLOSURE OF GRAND JURY
)	MATERIAL

COMES NOW the United States of America by and through GREGORY A. BROWER, United States Attorney, and RONALD C. RACHOW, Assistant United States Attorney, and requests authorization from this Court to disclose grand jury materials and testimony acquired in the above captioned case.

Rule 6(e)(3)(E) of the Federal Rules of Criminal Procedure states, "The court may authorize disclosure – at a time, in a manner, and subject to any other conditions that it directs – of a grand- jury matter: (i) preliminarily to or in connection with a judicial proceeding."

Federal Rules of Criminal Procedure 6(a)(3)(F) states, "A petition to disclose a grand-jury matter under Rule 6(e)(3)(E)(i) must be filed in the district where the grand jury convened. The Rule allows the government to file the motion ex parte.

In the instant case, Michon Mills has been indicted by the grand jury and has appeared for arraignment and entry of plea. A plea of not guilty was entered and the case has been set for trial.

1 Therefore, there is no need for any further secrecy concerning grand jury matters pertaining to
2 this case and the Government requests permission to turn over materials and testimony acquired
3 during the investigation of this case so as to comply with the rules of discovery and Brady/Giglio
4 obligations. Granting of this Order will serve the ends of justice and expedite resolution of the
5 case.

6 Submitted this 30 day of July, 2009.


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8 Respectfully Submitted,

9 GREGORY A. BROWER
10 United States Attorney

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12 RONALD C. RACHOW
13 Assistant United States Attorney

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16 Based upon the Petition of the United States Attorney for the District of Nevada, and for
17 good cause shown, the United States Attorney's Office for the District of Nevada is hereby
18 authorized to disclose evidence and testimony taken by the federal grand jury in relation to the
19 above-captioned case.

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21 Dated this 6th day of August, 2009.

22 
23 LARRY R. HICKS
24 United States District Judge
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